

Bob Grover
Bremen Corporation
405 North Industrial Drive
Bremen, IN 46506

Re: 099-12119
First Significant Permit Modification to
Part 70 No.: T 099-7476-00033

Dear Bob Grover:

Bremen Corporation was issued a permit on December 9, 1999 for operation of stationary vinyl coated foam product manufacturing source. A letter requesting changes to this permit was received on March 31, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modifications consist of changes in monitoring conditions. As there is a dry filter and a pre-filter before the oxidizer. Hence, there will be no particulate matter emission from Stack 32. Therefore conditions related overspray are removed from the monitoring conditions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File – Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector – Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Bremen Corporation
405 North Industrial Drive
Bremen, Indiana 46506**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 099-7476-00033	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 9, 1999
First Significant Permit Modification No.: T 099-12119	Pages affected: 31 and 32
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of SSM 099-10314-00033, issued on September 10, 1999, the Permittee shall perform testing on the catalytic oxidizer to determine the overall VOC control efficiency (capture and destruction). Testing of the catalytic oxidizer shall be repeated at least once every two and one half (2.5) years for efficiency using methods approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

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D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage and emissions for the most recent twelve (12) month period.

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the the spray coating in Process 1 and Process 3 is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Parametric Monitoring

- (a) Continuous records of the thermal oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 1, 2, 3, or 4 is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, when operating, the catalytic incinerator shall maintain a minimum operating temperature of 550 degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least 95 percent overall control (capture and destruction) efficiency for VOC. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is below 550 degrees Fahrenheit.

The instrument used for determining the temperature shall comply with Section C - Temperature Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.2, D.1.3, and D.1.10 the Permittee shall maintain a log of daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Bremen Corporation
Source Location:	405 North Industrial Drive, Bremen, IN 46506
County:	Marshall
SIC Code:	3069
Operation Permit No.:	T 099-7476-00033
Operation Permit Issuance Date:	December 9, 1999
Significant Permit Modification No.:	T 099-12119-00033
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from Bremen Corporation relating to the operation of stationary vinyl coated foam product manufacturing source.

History

On March 31, 2000, Bremen Corporation submitted an application to the OAM requesting to remove conditions related to monitoring and modify condition of record keeping at their existing plant. Bremen Corporation was issued a Part 70 permit on December 9, 1999. The permit shall be modified as follows (language deleted is shown with a ~~strikeout~~, language added is shown in **bold**):

1. There is a dry filter at Process1 and 3, there is a prefilter before the oxidizer, and the catalyst bed in the oxidizer would also act as a filter. Therefore, there should be no particulate emitted from Stack 32. Therefore condition D.1.10(a) of the permit is modified as follows:

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. ~~To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating stack 32 while one or more of the spray booths at Process 1 and Process 3 are in operation.~~ The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
2. The only source of particulate matter that could realistically be emitted outside of the plant would be from the spray operations Process 1 and 3. Since those processes vent to the oxidizer, there should be no over-spray. Therefore condition D.1.10(b) of the permit is modified as follows:

D.1.10 Monitoring

- (b) ~~Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
3. Change the record keeping condition D.1.12 (b) to reflect no over-spray as stated in statement # 2 above. This modification is as follows:

D.1.12 Record Keeping Requirements

- (b) To document compliance with Conditions D.1.2, D.1.3, and D.1.10 the Permittee shall maintain a log of ~~weekly overspray observations~~, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Existing Approvals

The source was issued a Part 70 Operating Permit T099-7476-00033 on December 9, 1999.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 31, 2000.

Emission Calculations

There were no emission calculations required for this modification

Conclusion

The operation of this stationary vinyl coated foam product manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 099-12119-00033.